

FILED

JUL 27 2022

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
SANIYA WATKINS,)
)
Defendant.)

4:22CR420 SEP/SRW

INDICTMENT

The Grand Jury charges:

A. INTRODUCTION

1. “Dealership D” was an auto dealer located in Ellisville, Missouri, within the Eastern District of Missouri.
2. First Community Credit Union (“FCCU”) was a financial institution with branches located in the Eastern District of Missouri.
3. TransUnion was a consumer credit reporting agency. TransUnion’s servers were located outside the State of Missouri.
4. RouteOne software was an accounting and management system for auto dealerships. RouteOne’s web-based platform allowed dealerships to view customers’ credit scores, manage deals, and facilitate integration with various third-party providers. RouteOne’s computer servers were located in Nevada. Dealership D used Route One to process vehicle sales.
5. “A.E.” was a real person who resided outside the Eastern District of Missouri. A.E.

did not know Defendant **SANIYA WATKINS** (“**WATKINS**”) and never gave **WATKINS** permission to use A.E.’s personal identification information (“**PII**”) in any manner including, but not limited to, securing loans or completing purchases.

6. At all times relevant to this indictment, **WATKINS** was a resident of Missouri.

The Scheme to Defraud

7. Beginning on or about March 21, 2022 and continuing until on or about March 22, 2022, the defendant,

SANIYA WATKINS,

and others known and unknown to the Grand Jury, knowingly devised and intended to devise a scheme to obtain a vehicle from an auto dealership by using the name and personal identification information of victim A.E to obtain pre-approval for an auto loan and to complete the sales contract for the purchase of a vehicle.

Manner and Means

It was part of the scheme that:

8. On or about March 21, 2022, **WATKINS**, used A.E.’s **PII**, to complete an online application and secure pre-approval for a loan from FCCU. During the pre-approval process, FCCU submitted A.E.’s **PII** to TransUnion to determine A.E.’s credit history.

9. On or about March 22, 2022, **WATKINS** used A.E.’s **PII** at Dealership D to complete loan paperwork and a vehicle purchase agreement for a 2014 Jeep Grand Cherokee. The total sales price of the Jeep was \$25,421.00. During the transaction, Dealership D submitted A.E.’s **PII** to RouteOne to determine A.E.’s credit history.

COUNTS ONE AND TWO
(Wire Fraud, 18 U.S.C. § 1343)

The Grand Jury further charges that:

10. All of the allegations set forth in paragraphs 1-9 above are hereby incorporated in support of the following charge as if set forth here in full.

11. Between on or about March 21, 2022 and March 22, 2022, in the Eastern District of Missouri and elsewhere,

SANIYA WATKINS,

the defendant herein, for the purpose of a scheme to defraud and to obtain money and property by means of material misrepresentations, and attempting to do so, knowingly caused to be transmitted by means of interstate wire transmission, the signals and sounds described below for each count, each transmission constituting a separate count:

COUNT	DATE	DESCRIPTION OF WIRE
One	3/21/2022	A.E.'s stolen PII was transmitted from FCCU to TransUnion
Two	3/22/2022	A.E.'s stolen PII was transmitted from Dealership D to RouteOne

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT THREE

(Aggravated Identity Theft, 18 U.S.C. § 1028A)

12. On or about March 21, 2022, in the Eastern District of Missouri,

SANIYA WATKINS,

the defendant herein, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), specifically, Title 18 United States Code Section 1343 (wire fraud), did knowingly possess and use, without lawful authority, a means of identification of

another person, to wit: the name of “A.E.,” knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNT FOUR

(Aggravated Identity Theft, 18 U.S.C. § 1028A)

13. On or about March 22, 2022, in the Eastern District of Missouri,

SANIYA WATKINS,

the defendant herein, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), specifically, Title 18 United States Code Section 1343 (wire fraud), did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: the name of “A.E.,” knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A and 2.

A TRUE BILL.

FOREPERSON

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